

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

EMERY STEVE BROWN)	
PLAINTIFF)	
VS.)	CASE NO. 3.05-CV-0681-
		MHT-CSC
CLAIMS MANAGEMENT, INC.)	
DEFENDANT)	

PLAINTIFF'S RULE 26 DISCLOSURES

Comes now Plaintiff Emery Steve Brown as required by the Court's Scheduling Order dated October 3, 2005, and pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure would state as follows:

1. The following is a list of names and addresses of individuals known by the Plaintiff who are persons likely to have discoverable information in support of the Plaintiff's claims:

- (a) Emery Steve Brown
Post Office Box 145
Roanoke, Alabama 36274

Mr. Brown will offer testimony to support the claims made in his Bill of Complaint.

- (b) All persons listed on the Defendant's Rule 26 disclosures;

(c) Mrs. Emery Steve Brown

She will testify as to the effects of the Defendant's action upon her husband.

(c) Lake Martin Physical Therapy representation
1120 Airport Drive
Suite 103
Alexander City, Alabama 35010

Testimony will be offered concerning the physical therapy of Mr. Brown.

(d) Mark Samples
Physical Therapy
Phone: 256-329-8180

Mr. Staples will testify as to physical therapy done concerning the Plaintiff.

(e) Dr. Jeff Stewart
Woodland Medical Clinic
Woodland, Alabama
Phone: 256-449-2001

He and Physician's Assistant Bill Caypless will present information as treating physicians concerning the care of the Plaintiff.

(f) Dr. Allen W. Lazenby
Lee County Orthopedics
334-745-6271

Dr. Lazenby will testify as one of the Plaintiff's treating physicians.

(g) Dr. Donald W. Rhodes
Opelika, Alabama
334-821-1219

Will testify as a treating physician of the Plaintiff in this matter.

(h) The names and addresses of additional persons employed by Claims Management who had any dealings with the Plaintiff's file also have information which will be relevant to the issues in this case.

After discovery Plaintiff will supplement the responses in this matter.

2. A description by category and location of all documents, data, compilations and tangible things that are in the possession, custody or control of the Plaintiff and that the Plaintiff may use to support its claims or defense unless solely for impeachment are medical records relating to the Plaintiff's care and treatment. Additional documents will be identified as discovery progresses in this matter.

3. Computation of any category of damages claimed by the disclosing party - Plaintiff will claim damage for pain and suffering and emotional distress in an amount unknown to the Plaintiff at this time. Plaintiff will also claim punitive damages from the Defendant.

DONE this 20th day of October, 2005.

/s/ John A. Tinney TIN005
Attorney for Plaintiff
Post Office Box 1430
739 Main Street
Roanoke, Alabama 36274
(334) 863-8945

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by faxing or by depositing a copy of the same in the United States Mail, in an envelope with adequate postage prepaid thereon and properly addressed to him.

Jeffery A. Brown
Post Office Box 139
Columbus, Georgia 31902-0139
Via Facsimile:

This 20th day of October, 2005.

/s/ John A. Tinney TIN005
Attorney for Plaintiff
Post Office Box 1430
Roanoke, Alabama 36274
334-863-8945